

To whomever it may concern,

Having read and discussed the content of the new London Housing Plan, specifically Policy H17 regarding purpose build student accommodation (PBSA), Royal Holloway Students' Union would like to flag certain issues within the proposal. For the most part, it is both exciting and refreshing to see considerations being made for low income students, and is a welcome change in such policies. The overarching ethos is clearly in the right place, however, the nuances are somewhat amiss.

Firstly, an issue that has been raised numerous times regarding the appropriateness of maintenance grants is once again raised due to point 4.17.7, which reads:

"The definition of affordable student accommodation is a PBSA bedroom that is provided at a rental cost for the academic year equal to or below 55 per cent of the maximum income that a new full-time student studying in London and living away from home could receive from the Government's maintenance loan for living costs for that academic year."

The issue here is not with the 55% of student income, it is instead with the use of the maximum income from a maintenance loan. Whilst low income students certainly would benefit as they are caught in this bracket, and high income students are able to rely on family subsidies, students left in the middle tiers, especially those from the lower tiers, could suffer greatly due to this.

The second issue would be with the lack of definition of a "Higher Educational Institution". A suggested option could be to consider that an HEI is defined as such due to its presence and approval on the register maintained by the Office for Students.

The third issue comes from section 4.17.12, which reads:

*"To enable providers of PBSA to maximise the delivery of affordable student accommodation by increasing the profitability of the development, boroughs should consider allowing the **temporary use of accommodation** during vacation periods for ancillary uses."*

Whilst we believe that this will absolutely help with affordability, we also believe that provisions should be made for students wishing to live beyond the 38 weeks, especially international students. Longer letting periods should be readily available for all students, and priority should be given to international students for these lets. Priority should also be given to students on longer courses, to those in the future who will be studying two year accelerated courses, and to students required to work over the holiday period.

Nominations agreements, whilst offering security, favours larger developers over smaller, not for profit organisations. We would suggest providing an option for those who guarantee 100% of their rooms as affordable, in which they are no longer required to gain a nominations agreement with the university, however all other rules would still apply. We would also like to see clearer definitions of the nominations agreements, and what they would entail – we could recommend a

clear, binding, hard set of agreements which would ensure the security and wellbeing of students living in the accommodation.

Finally, one concerning aspect can be found in section 4.17.8, which reads:

*“If 35 per cent affordable student accommodation is not met,
a scheme will be considered under the **Viability Tested Route** in line with
part E of Policy H6 Threshold approach to applications and the Mayor’s
Affordable Housing and Viability SPG.”*

We have concerns that this may be considered as an out for developers. The affordable PBSA is a crucial element of the plan, and to see it go to waste would be greatly disappointing. We believe that this 35% figure needs to be secured and guaranteed for this plan to be the success it could be.

We thank you for your time and consideration, and solemnly hope that you take into account what has been outlined in our recommendations, and in the recommendations of other Students’ Unions throughout London.

Yours Faithfully,

Royal Holloway University of London, Students’ Union